



PAULE, CAMAZINE
& BLUMENTHAL, PC

February 18, 2021

D. Keith Henson
khenson@pcblawfirm.com
(314) 244-3628

Sent via email – erin_mchugh@moed.uscourts.gov

Honorable Abbie Crites-Leoni
United States District Court
Eastern District of Missouri
555 Independence Street
Cape Girardeau, MO 63703

RE: Quinta Sanders, Plaintiff v. Mississippi County, Missouri, et al., Defendants
United States District Court, Eastern District of Missouri, Southeastern Division
Case No. 1:18-CV-00269-ACL

Dear Judge Crites-Leoni:

Pursuant to your Order of February 10, 2021, below is an outline of the terms of the settlement in the above matter:

- 1) Defendants City of Charleston, Missouri, Robert Hearnes, Curtis Arnold, Zachary Matney, and Austin Henson (“City of Charleston Defendants”) and the Plaintiff have agreed to settle all of the Plaintiff’s claims against the City of Charleston Defendants only for the sum of \$500,000.00;
- 2) The City of Charleston Defendants and the Plaintiff have agreed that the Settlement Proceeds will be distributed as follows:
 - a. The sum of Twenty Seven Thousand Two Hundred Seventy Two and 71/100 Dollars (\$27,272.71) to Quinta Sanders, individually, as the natural mother of Tory D. Sanders, deceased, and as an heir and beneficiary of Tory D. Sanders, deceased;
 - b. The sum of Twenty Seven Thousand Two Hundred Seventy Two and 72/100 Dollars (\$27,272.72) to Summer Barrett, individually, and as the wife of Tory D. Sanders, deceased, and as an heir and beneficiary of Tory D. Sanders, deceased;
 - c. The sum of Twenty Seven Thousand Two Hundred Seventy Two and 73/100 Dollars (\$27,272.73) to be paid to Quinta Sanders, as the Next Friend of J.A.M.C., T.D.Q.S., T.M.D.S., J.T.E.C., L.C., J.S., and Z.S. for a total payment of One Hundred Ninety Thousand Nine Hundred Nine 11/100 Dollars (\$190,909.11) to be used for the purchase of annuities for each minor;
 - d. The sum of Twenty Seven Thousand Two Hundred Seventy Two and 73/100 Dollars (\$27,272.73) paid to Summer Barrett, as Next Friend of T.D.S. and D.C.B. for a total payment of Fifty Four Thousand Five Hundred Forty Five and 46/100 Dollars (\$54,545.46) to be used for the purchase of annuities for each minor; and



PAULE, CAMAZINE
& BLUMENTHAL, PC

Hon. Abbie Crites-Leoni

February 18, 2021

Page 2

e. The sum of Two Hundred Thousand and 00/100 Dollars (\$200,000.00) for attorney fees to The Wendt Law Firm, P.C. and Law Office of Michael G. Hoskins, P.C.

3. The Parties have agreed that Next Friends will be appointed for nine minors so the Court can approve the minors' settlements from the proceeds of the death settlement. Plaintiff Quinta Sanders, as the Grandmother of seven of the minors, has agreed to be appointed the Next Friend of J.A.M.C., T.D.Q.S., T.M.D.S., J.T.E.C., L.C., J.S. and Z.S. Summer Barrett, as the Mother of two of the minors, has agreed to be appointed the Next Friend of her children T.D.S. and D.C.B.

4. The Parties have agreed that this is a confidential settlement and all documents filed with the Court concerning the settlement will be filed under "Seal." The Parties have also agreed that a Joint Application for Approval of the Settlement for the Injuries to and Death of Tory D. Sanders, Deceased will be filed and an Application for Approval of the Minors' Settlements from the Settlement for the Injuries to and Death of Tory D. Sanders, Deceased will be filed with the Court.

The terms of the settlement described above are the product of mutual agreement of the Plaintiff and the City of Charleston Defendants. Please let us know if you have any questions about the terms of the settlement.

Very truly yours,

PAULE, CAMAZINE & BLUMENTHAL, P.C.

A handwritten signature in black ink, appearing to read 'D. Keith Henson'.

D. Keith Henson
Attorney for the City of Charleston Defendants

and

Samuel M. Wendt
Attorney for Plaintiff

A handwritten note in black ink that reads "by D.K.H. with Permission and Consent" above a signature that appears to read "Samuel M. Wendt".